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*Attorneys for Retrieval-Masters
Creditors Bureau, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JORGE HERNANDEZ,)	Case No.: 2:16-CV-02591-JCM-VCF
)	
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER TO
)	EXTEND TIME TO FILE
RETRIEVAL-MASTERS CREDITORS BUREAU,)	ANSWER TO COMPLAINT
INC., a foreign corporation doing business as)	[ECF NO. 1]
AMERICAN MEDICAL COLLECTION AGENCY)	
)	FIRST REQUEST
Defendants.)	
)	

Pursuant to Local Rules 6-1 and 7-1, Plaintiff Jorge Hernandez (“Plaintiff”), and Defendant Retrieval-Masters Creditors Bureau, Inc. (“RCMB”), by and through their respective attorneys of record, stipulate as follows:

STIPULATION

1. Plaintiff filed his Complaint on November 8, 2016 [ECF No. 1].
2. RMCB recently retained counsel and a short extension is necessary to allow RMCB’s counsel to obtain the file and investigate the allegations in the Complaint before responding.
3. Plaintiff and RMCB also anticipate in engaging in settlement discussions on this case and wish to extend the deadline for RMCB to respond to the Complaint until December 16, 2016. This will allow the parties to continue settlement discussions without incurring additional fees and expenses.

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1 4. RMCB requests additional time to file a response to the Complaint and Plaintiff
2 does not object to the request.

3 5. Therefore, the parties agree that RMCB's response to the Complaint is now due
4 on or before **December 16, 2016**.

5 DATED: November __, 2016.

DATED: November __, 2016.

6 GORDON & REES LLP

7 */s/ Robert S. Larsen*

/s/ Mitchell D. Gliner

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11 *Attorneys for Retrieval-Masters Creditors*
12 *Bureau, Inc.*

Attorney for Plaintiff Jorge Hernandez

13
14
15 **ORDER**

16 IT IS SO ORDERED.

17 

18 UNITED STATES MAGISTRATE JUDGE

19 DATED: November 18, 2016

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